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May 27, 2025

BY ECF

Hon. Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Robert Birch, 23 CR 563 (LAK) (SDNY)

Dear Judge Kaplan:

I am writing on behalf of defendant Robert Birch and jointly with the government to respectfully request a three week adjournment of tomorrow's status conference before Your Honor. To briefly explain, the parties are in the final throes of plea negotiations, with defense counsel recently meeting with the government's mitigation committee and the former chief of the criminal division. The defense hopes to schedule a final meeting with the government and we anticipate that if the requested adjournment is granted, a change of plea hearing may occur in lieu of the rescheduled status conference. To facilitate these continued plea negotiations, the defendant consents to the exclusion of time under the Speedy Trial Act between May 28, 2025 and the next scheduled conference, pursuant to 18 U.S.C. § 3161(h)(7)(A).

Thank you for the Court's consideration of this application; I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Jamie Bagliebter, Esq.
Elizabeth Espinosa, Esq.
Assistant United States Attorneys (by ECF and email)